ANNUAL REPORT

2006

OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER

PROVINCE OF PRINCE EDWARD ISLAND

REPORT

OF THE

INFORMATION AND PRIVACY COMMISSIONER

OF

PROVINCE OF PRINCE EDWARD ISLAND

November 5, 2007

The Honourable Madam Kathleen M. Casey
Speaker of the Legislative Assembly
Province of Prince Edward Island
P.O. Box 2000
Charlottetown, PE
C1A 7N8

Dear Honourable Madam Casey:

I am pleased to submit the enclosed Annual Report of the Office of the Information and Privacy Commissioner for the period January 1, 2006 to December 31, 2006, pursuant to section 59(1) of the *Freedom of Information and Protection of Privacy Act*.

Respectfully,

Karen A. Rose
Acting Information and Privacy Commissioner

enclosure

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MESSAGE FROM THE INFORMATION AND PRIVACY COMMISSIONER

Four Years In

As Acting Information and Privacy Commissioner, I am pleased to have the opportunity to present this fourth annual report on the activities of the Office of the Information and Privacy Commissioner to the Speaker of the Prince Edward Island Legislative Assembly. Our office has overcome many challenges faced over the 2006 year, and I am pleased of the progress we have made under the circumstances.

I was appointed Information and Privacy Commissioner for Prince Edward Island in November, 2002, when our *Freedom of Information and Protection of Privacy Act* was first proclaimed. At that time, we established goals which we have referred to often when making decisions under our mandate. We have been guided by our mission to conduct the day-to-day affairs of this office with frankness, respect and integrity.

We have strived to maintain a positive relationship with provincial government bodies, and despite the conflicts which naturally occur when one party provides oversight for the decisions of another, we have found the public bodies to be cooperative. As the central core of our operations relates to these designated public bodies, we have decided to focus on one pubic body each year in our annual report, to describe the work the given public

body is doing in order to fulfil their obligations under the *Freedom of Information and Protection of Privacy Act*. As described later in this annual report, sometimes a public body will move beyond the requirements of the orders issued from this office, independently creating policies and procedures which enhance the intent of our legislation and, in effect, better the operations of the given public body.

Over the past four years, we have strived to operate the office in a fiscally responsible manner. The budget of this office may be reviewed at page 117 of the *Estimates of Revenue and Expenditures 2007*. In 2006, our total expenditures for the fiscal period of April 1, 2006 to March 31, 2007, amounted to $82,236.00.

Challenges Faced

Last year, Commissioner Wellner reported that because this office operates on a part-time basis, there is not sufficient time to address the quantity of tasks required to be performed with the quality one would expect in order to adhere to our mandate. Through rigorous prioritization, I believe we were able to successfully carry out our mandate in 2006. However, the resources of this office are certainly an issue which continues to be a concern. Examples of responsibilities which do not get the attention they require include public education, resource library and archives, research, as well as issues analysis and commentary.

A fundamental responsibility of the Information and Privacy Commissioner is to conduct reviews and issue orders when the reviews are completed. By May, 2006, a backlog of orders pending had accrued in the office, specifically, 24 on-going reviews regarding freedom of information and five on-going reviews regarding privacy protection.

For the remainder of 2006, we focused our efforts on eliminating the backlog. I am very pleased to report that 10 orders were issued between July and December, 2006, and all reviews are now current. This challenge could not have been met without the diligent efforts of Mary-Lynn Smith. Ms. Smith joined the office in June, 2006, and quickly immersed herself in the tasks required. Having said that, I would be remiss if I did not acknowledge the talent and commend the efforts of the previous administrative assistant, Ms. Ellen Connolly. Without her meticulous detail and exceptional organizational skills, this office could not have achieved the progress reflected within this annual report.

What's Ahead

Website Enhancements:

Throughout 2007, we are reviewing our website, not only to add and amend content, but also to enhance its appearance to better reflect the essence of freedom of information and protection of privacy. We are developing a logo which we hope will come to be identified with all of the work which our office produces. This action is another small step towards the public perception of independence of the Office of the Information and Privacy Commissioner.

Right to Know Week 2007:

In 2006, many provinces celebrated "Right to Know Week" during the final week of September. This year, the Office of Information and Privacy Commissioner for Prince Edward Island promoted "Right to Know Week" during the first week of October, 2007. Activities were planned to encourage discussion and further the public education associated with freedom of information. We will report on the details of this important effort next year, and we expect that it will become a yearly event

Routine Disclosure Policy:

I am pleased to observe that after four years' experience with access to information, public bodies are moving towards routine disclosure policies. Many public bodies are already actively disseminating information of public interest in hard copy, as well as via their web sites. In cooperation with the Office of the Access and Privacy Coordinator, it is expected that a routine disclosure policy and corresponding procedures will be implemented in 2008.

Health Information Protection:

An ambitious Drug Information System has been developed and is about to be implemented in Prince Edward Island. In addition, it is expected that a province-wide comprehensive Electronic Health Record is on the horizon. Given this likelihood, I will be recommending the enactment of health privacy protection legislation prior to the implementation of the Electronic Health Record.

PUBLIC BODY FOCUS:

DEPARTMENT OF HEALTH AND SOCIAL SERVICES AND SENIORS

Employee Privacy:

Of the four orders issued in 2006 pertaining to matters of privacy, three involved the same public body, presently referred to as the Department of Health and Social Services and Seniors (the "DHSSS"). Like other public bodies, DHSSS has much work to do to create a culture of privacy awareness. However, in my view, DHSSS has made strides in initiating policies and procedures which move beyond what has been requested of them by this office. The head of DHSSS has been receptive to most of the recommendations from this office, and actions within DHSSS demonstrate a willingness to implement better privacy protection mechanisms.

Information "Sharing":

Order PP-06-001 (summarized on page 11) shows us that inter-departmental transfers of personal information continues to be a practice among government departments, years after the proclamation of the *Freedom of Information and Protection of Privacy Act.* Some public bodies are still learning that personal information is the property of the individual, and that the public body does not have a right to use it at will. Following the findings in Order PP-06-001, it is encouraging to note the actions taken by DHSSS.

Extensive education has taken place with staff in DHSSS, and staff have been advised of the need to protect individual privacy. Staff education has also stressed the importance of protecting employees' personal information from disclosure without the consent of the employee. Provincial privacy policies have been developed based on the ten privacy principles of the "Canadian Standards Association Model Code", as well as the provisions of the *Freedom of Information and Protection of Privacy Act*.

DHSSS has reported that a privacy manual came into effect in May, 2007, and related education sessions for staff were held throughout the months of May and June. The privacy manual is comprehensive and easy to follow, and DHSSS has advised that it will be made available to the general public through its web site. It advocates the use of Privacy Impact Assessments ("PIAs") to existing and new programs, adopting a practice which has been in existence in other provinces with more mature freedom of information and protection of privacy legislation. The Office of the Information and Privacy Commissioner is pleased that this privacy manual includes a process to follow when an unauthorized disclosure of personal information occurs, as well as an internal complaint process.

Name Tags:

In 2006, DHSSS responded to a complaint regarding the mandatory use of full name tags by employees (see Order PP-06-003, summarized on page 12). Shortly after DHSSS was advised of this complaint, and long before the order was issued, DHSSS revised their policy, allowing employees a choice of wearing just the first name, or the first and last name, on their name tags. Although there was no admission of a privacy violation by DHSSS at that time, I found this to be a conciliatory approach.

As previously noted, not all of my recommendations are followed, and I confirm that it is within the discretion of the public body to accept or reject suggestions which do not form part of my actual order. In Order PP-06-003, I recommended the head of DHSSS change the requirement in its policy that the cost of a new replacement name tag be assumed by the staff member who has decided that he or she wishes to display their first name only. Although the Complainant did not object to this new policy, paying to protect one's privacy seems contrary to the principles upon which Part II of the *FOIPP Act* is built. This recommendation was not followed by DHSSS.

Ongoing Education:

Due to the nature of the services it provides to the citizens of Prince Edward Island, much of the information in the custody and control of DHSSS is personal information . For this reason, I believe it is incumbent on DHSSS to provide its employees with a strong focus on privacy protection. The evidence indicates that DHSSS has already started to do just that. As an example, I understand that several privacy-related items have been published in the DHSSS Employee Newsletter, with the goal being to submit an item of interest for publication quarterly. Such proactive measures to raise the awareness of privacy protection will go a long way in supporting the purposes of the *Freedom of Information and Protection of Privacy Act* and, in turn, to reducing the number of privacy complaints directed to DHSSS.

SUMMARY OF SELECTED ORDERS

Freedom of Information

Order No. 06-003 - Warning Letters re Tobacco Sales to Minors:

This order arose from a request to access warning letters issued to establishments for selling tobacco to provincial "mystery shoppers" posing as minors between 2002 and 2004. The Department of Health ("Health") denied the Applicant access to the information requested based on sections 14 and 15 of the *Freedom of Information and Protection of Privacy Act* (the "*FOIPP Act*"). The text of the warning letters was provided to the Applicant without releasing the names and addresses of the establishments. Thirty-four establishments were considered third parties to this review and were given an opportunity to make submissions; six responded.

Health stated that, pursuant to section 14 of the *FOIPP Act*, the disclosure of the information requested could be harmful to the business interests of third parties and could result in undue financial loss to those establishments. The Applicant submitted that the business operators did not "give" the information; they were "caught". Also, neither Health nor the third parties had offered evidence to support their claim of undue financial loss. The Commissioner agreed that "commercial information" does not have the broad interpretation suggested by Health. As well, the Commissioner agreed that the information the Applicant seeks could not have been "supplied in confidence" by the third parties; they were unaware that the information was being collected until they were issued their warnings. The Commissioner ruled that there was insufficient evidence of unfair damage to the third parties' reputations by disclosure of the information at issue.

In its section 15 submission, Health argued that due to the small size of P.E.I., the name of the businesses, their owners, their employees, and the business addresses would all reveal personal information of individuals. The Commissioner disagreed with Health's reasoning that the name of a business qualifies as personal information, but she did agree that the name of an employee working for a retailer is personal information and could be severed from the records at issue. The Commissioner concluded that even if business names were personal information in accordance with the *FOIPP Act*, disclosure of the business names at issue would not constitute an unreasonable invasion of personal privacy.

Health also claimed that section 22 of the *Public Health Act* is paramount over the *FOIPP Act*. This argument was rejected by the Commissioner.

The Commissioner ordered Health to disclose the records at issue, severing only the names of the employees of the retail establishments about which the records pertain.

Order No. 06-004 - Hospital Accreditation Reports:

This review arose out of two requests to access accreditation survey reports relating to hospitals in Souris, Montague, O'Leary and Alberton. The Department of Health ("Health") withheld a large part of the records pursuant to sections 22 and 24 of the *FOIPP Act*.

Health submitted that the reports contain analyses, advice, and recommendations for the purpose of providing evaluation of services and guidance for the future. It outlined the steps involved in both the accreditation process and in conducting the surveys. Health submitted that disclosure would compromise honest and direct input, and would breach confidentiality in the process of gathering information to formulate the advice, recommendations, analyses, and policy options for the hospitals.

Health also argued that portions of the 2004 reports could not be provided because they were considered incomplete. The audit reports were still in process and full disclosure would prejudice their use and results. Before releasing the reports, Health wanted to analyze them and implement an appropriate action plan to respond to the recommendations therein.

Section 22 of the *FOIPP Act* had not been analyzed in any previous orders of this office. Upon reviewing orders from other provinces relating to section 22, namely, advice from officials, the Commissioner decided that the term "advice" should not be given as broad an interpretation as some public bodies have argued. She noted that section 22 was intended to enable the provision of candid advice to public bodies without fear of outside scrutiny. Section 22 allows those persons who have the responsibility of making decisions to freely discuss the issues before them in order to arrive at well-reasoned decisions. The Commissioner stressed that section 22 is meant to protect formal reports which are in the draft stages and subject to potential misunderstanding. In this case, it was not the reports which were incomplete, but the responses to the reports which were incomplete.

The Commissioner found that Health did not prove that disclosure of the severed portions of the reports at issue could reasonably be expected to reveal the consultations and deliberations which may have been involved in the lead-up to the reports. She found that disclosure of the reports would not hinder Health's stated goal of responding to the reports within a three-year period, and that the "recommendations" made in the reports at issue are simply remedies for Health to comply with national standards of health care accreditation.

The Commissioner found that the information contained in the accreditation reports are not the type of "advice" meant to be excepted from disclosure under section 22 of the *FOIPP Act* and ordered the head of Health to disclose the records at issue in their entirety.

Order No. 06-005 - Inspection Records re Restaurant Standards:

This order arose out of a request to review a decision of the Department of Health ("Health") denying the Applicant access to health inspection orders and warning letters issued to Island restaurants. Eleven third- party establishments were notified of this review; one responded with written submissions.

Health stated that, pursuant to section 14 of the *FOIPP Act*, disclosure of the records at issue could be harmful to the business interests of the third parties, could result in undue financial loss to those establishments, and would result in similar information no longer being supplied by the restaurants. One third party submitted that disclosure of the records at issue would damage its business.

The Acting Commissioner found that the information contained in the records at issue, namely, information relating to the day-to-day operation of a business, is not the type of information that section 14 is meant to protect. She agreed with the Applicant that all of the information at issue was collected by a health officer, not "supplied" by the third-party businesses, and she concluded that Health failed to provide sufficient evidence of harm.

Relying on section 15 of the *FOIPP Act*, Health argued that disclosure would reveal personal information of a third party. It submitted that a name of an establishment on P.E.I. is enough identifying information to reveal the identity of the business owner. However, the Acting Commissioner found that business names do not constitute personal information.

The Applicant suggested that even if the business names were severed from the records at issue, the remaining information indicating the precise reasons for the issuance of the warnings and the orders could have been provided. The Acting Commissioner stated that she would certainly have considered this request had Health been successful in its submissions. She saw no evidence that Health considered that option and encouraged Health to consider such compromises more thoroughly in future.

Health also stated that section 22 of the *Public Health Act* applied to the information at issue and that it is paramount over the *FOIPP Act*. The Acting Commissioner found that no conflict exists which would give rise to paramountcy.

The Commissioner ruled that neither section 14 nor section 15 of the *FOIPP Act* apply to except the records at issue from disclosure and ordered Health to disclose the records, severing only the personal names set out therein.

In conclusion, she suggested that policies of routine disclosure are a very useful and proactive activity of public bodies that can save time, effort and resources over the long term.

Protection of Privacy

Order No. PP-06-001 - Inter-departmental Transfers of Personal Information:

This order arose from a complaint relating to three public bodies. The Complainant was an employee of two of the three public bodies, and claimed that the three public bodies collected and disclosed personal information between one another without the Complainant's knowledge or consent. The information at issue was detailed scheduling information of the Complainant's work at one of the three public bodies.

The public bodies relied on section 31 of the *FOIPP Act*, stating that the information collected was "necessary" for an operating program or activity and was collected for the purposes of an administrative investigation. The public bodies claimed they were trying to determine whether the Complainant was inappropriately claiming benefits and whether disciplinary measures were warranted. Although "managing employees" is an activity, the Acting Commissioner found that concerns relating to the Complainant's second job could have been thoroughly addressed with the Complainant by finding a less intrusive route. It was noted that there were no problems identified with the Complainant's actual work performance prior to the collection of the Complainant's work schedule information, and that this was not a situation where unsafe work practices led to a formal investigation.

The Acting Commissioner found that the information at issue is personal information, as it is employment history of an identifiable individual. She held that there would need to be a formal process set in place in order for this collection of personal information to qualify as an administrative investigation under the *FOIPP Act*, which there was not. The Acting Commissioner stated that if the submission was accepted, every employee who had a second job with another public body would be subjected to a similar investigation. She agreed with the Complainant that this contrast cannot be tenable if the *FOIPP Act* is to properly carry out its function of protecting the personal information of Prince Edward Islanders from inappropriate access by provincial government bodies.

The Acting Commissioner found that the purpose for the disclosure of the personal information (to address a human resource issue for another public body) was not consistent with the original purpose of collection (for payroll purposes to ensure conformity with collective agreements and to deal with labour relations issues which may arise within that public body).

It was found that each of the public bodies had violated Part II of the *FOIPP Act*. The Acting Commissioner ordered the public bodies to destroy the personal information that was improperly collected, as if the collection had never occurred. The Acting Commissioner recommended the originating public body continue to provide employees with regular training on protection of privacy and confidentiality, including an educational component stressing the importance of protecting employees' personal information from collection without the consent of the employee.

Order No. PP-06-003 - Name Tags:

This complaint related to the implementation of a dress code policy within a public body workplace requiring employees to have their full names placed on their name tag. The Complainant argued that personal information was being disclosed without the employees' consent.

The parties agreed that the Complainant's full name is personal information in accordance with the *FOIPP Act*. The Public Body argued that while an employee's name is personal information, the disclosure of the name itself would not reveal personal information about the employee to a potential applicant unless additional personal information was available. Additional arguments included: (i) that full names are required in order that clients can complain to the appropriate regulatory bodies, thus protecting the public from unprofessional conduct; (ii) that name information is available to the public by way of the Government Services telephone directory; and (iii) that the name of the Complainant was provided solely in her professional capacity.

The Acting Commissioner found that disclosure of the Complainant's name is not *necessary* for public scrutiny, as no evidence had been provided by the Public Body which called its accountability for nursing personnel into question.

The Complainant stated that having her full name on her name tag causes her concern for her security. She cited two examples to support her argument: a robbery at her place of employment, and being contacted by a patient at her home. The Acting Commissioner held that in circumstances where there is a risk of harm, withholding names is justified. All employees have the right to be safe, and public bodies have to balance the interests of their clients and staff when they are asked to release names of employees. It is clear that within the public bodies, safety and security override the necessity of full names on name tags. There is an immediate personal risk which arises as a result of having a threatening individual know a full name, combined with having a full description of an employee.

The Acting Commissioner pointed out that the Complainant would also be identifiable by a name tag which only discloses her first name and, under these circumstances, a first name would still be considered personal information of the Complainant. However, the Acting Commissioner does acknowledge that staff need to be identified in some way in order to properly perform their duties and satisfy their employer's and their profession's needs of accountability.

The Acting Commissioner stated that if the Department of Health had not changed its policy for other reasons than privacy concerns, she would have ordered the head of the Department of Health to stop disclosing the Complainant's personal information. However, the current policy is privacy compliant.

Investigation Report No. PP-06-004 - Disability Support Program:

This investigation began due to privacy concerns of the Complainant relating to the Disability Support Program (the "DSP"). The Complainant is concerned that more personal information than is necessary is being collected from potential participants at the intake stage of the DSP. As well, the Complainant has concerns that employees of the DSP are not able to answer fully why and under what authority participants' personal information is being collected.

Other complaints relating to the DSP had been investigated and resolved by previous orders of this office, including Orders PP-04-001, PP-04-002 and PP-04-005. Given this past involvement, it was agreed that the Department of Social Services and Seniors (the "DSSS") would undertake a short-form Privacy Impact Assessment (the "PIA") to address shortfalls in the privacy sensitivity of the DSP. A short-form PIA had been developed through the collaboration of this office and the Access and Privacy Coordinator for Prince Edward Island.

The Public Body completed the PIA, applying it to the information collection of the DSP. It provided all forms used to collect information for the DSP, and provided additional information relating to the collection of the Social Insurance Number (the "SIN"). The Public Body explained how the DSP is a program which provides a range of disability-related supports to individuals with qualifying disabilities. Participants are expected to contribute to the cost of disability-related support in accordance with their financial means.

The Acting Commissioner found that the basic personal information (such as name, address and contact information), the health information relating to the participant's disability, and the financial information to determine means, are all categories of personal information which are necessary for operating the DSP. However, one exception she identified was the collection of the participants' SIN.

The Acting Commissioner found that the SIN is a highly personal piece of information, as it can be linked to other personal information about an individual, including personal, financial, and health information. The Acting Commissioner found that the SIN is unnecessarily collected by the DSP at the intake stage and recommended that DSSS remove collection of the SIN from the DSP Intake Record.

The Acting Commissioner found that clients should be able to ask questions and receive accurate, timely responses regarding the collection of their personal information. The intake worker and the DSP worker assigned to a participant's file should be knowledgeable regarding their authority to collect each piece of personal information requested. She recommended that the Public Body upgrade its education to these employees relating to the *FOIPP Act*, so that they are fully prepared to reply to queries from DSP participants and potential participants. The Acting Commissioner concluded by recommending that all forms of the DSP include an updated *FOIPP Act* advisory relating to collection of personal information.

STATISTICS

Appendix "A" - Freedom of Information

Summary of Applications for Review
January 1, 2006 - December 31, 2006

Public Body	Requests for Access to Information *	Application for Review Ongoing	Application for Review 2006	Resolved without Order	Order Issued	Ongoing
Agriculture, Fisheries and Aquaculture	3*	2	0	0	2	0
Commission scolaire de langue francaise	0*	0	0	0	0	0
Community and Cultural Affairs	4*	1	0	0	0	1
Development and Technology	2*	2	1	2**	0	1
Eastern School District	2*	1	0	0	1	1***
Education	1*	0	0	0	0	0
Environment, Energy and Forestry	15*	1	2	1	1	1
Executive Council's Office	3*	1	2	0	0	3
Fathers of Confederation Buildings Trust	0*	0	0	0	0	0
Health	2*	4	0	0	4	0
Island Regulatory and Appeals Commission	1*	0	0	0	0	0

Public Body	Requests for Access to Information *	Application for Review Ongoing	Application for Review 2006	Resolved without Order	Order Issued	Ongoing
Island Waste Management Corporation	0*	0	0	0	0	0
Legal Aid	1*	0	0	0	0	0
Office of the Attorney General	6*	2	1	1	0	2
Office of the Premier	0*	0	0	0	0	0
PEI Liquor Control Commission	0*	0	0	0	0	0
PEI Public Service Commission	0*	0	0	0	0	0
Provincial Treasury	2*	1	0	0	0	1
Social Services and Seniors	6*	0	2	2	0	0
Tourism	3*	2	0	0	0	2
Transportation and Public Works	2*	3	0	0	2	1
Western School District	1*	0	0	0	0	0
Workers Compensation Board of Prince Edward Island	5*	2	0	1	0	1
Workers Compensation Board Appeals Tribunal	0*	0	1	0	0	1
TOTAL:	59*	22	9	7	10	15

* Obtained from Access and Privacy Services Office
** Closed January 2007
*** Addendum to Order issued April 2007

STATISTICS

Appendix "B" - Protection of Privacy

Summary of Privacy Complaints
January 1, 2006 - December 31, 2006

Public Body	Privacy Complaints to Access and Privacy Services *	Privacy Complaints to Commissioner Ongoing	Privacy Complaints to Commissioner 2006	Resolved without Order	Order Issued	Ongoing
Agriculture, Fisheries and Aquaculture	0*	0	0	0	0	0
Commission scolaire de langue francaise	0*	0	0	0	0	0
Community and Cultural Affairs	0*	0	0	0	0	0
Development and Technology	0*	0	0	0	0	0
Eastern School District	0*	0	0	0	0	0
Education	0*	0	0	0	0	0
Environment, Energy and Forestry	0*	0	0	0	0	0
Executive Council's Office	0*	0	0	0	0	0
Fathers of Confederation Buildings Trust	0*	1	0	1	0	0
Health	1*	2**	1	1	2	0
Island Regulatory and Appeals Commission	0*	0	0	0	0	0

Public Body	Privacy Complaints to Access and Privacy Services *	Privacy Complaints to Commissioner Ongoing	Privacy Complaints to Commissioner 2006	Resolved without Order	Order Issued	Ongoing
Island Waste Management Corporation	0*	0	0	0	0	0
Legal Aid	0*	0	0	0	0	0
Office of the Attorney General	0*	1**	1	1	1	0
Office of the Premier	0*	0	0	0	0	0
PEI Liquor Control Commission	0*	0	0	0	0	0
PEI Public Service Commission	0*	1**	0	0	1	0
Provincial Treasury	0*	0	0	0	0	0
Social Services and Seniors	2*	1	1	0	1	1
Tourism	0*	0	0	0	0	0
Transportation and Public Works	2*	0	2	1	0	1
Western School District	0*	0	0	0	0	0
Workers Compensation Board of Prince Edward Island	0*	2	0	1	1	0
Workers Compensation Board Appeals Tribunal	0*	0	0	0	0	0
TOTAL:	5*	8	5	5	6	2

* Obtained from Access and Privacy Services Office

** One complaint and subsequent order involves three public bodies